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November 29, 2019

VIA ECF

Hon. Paul A. Engelmayer
United States District Judge
Southern District of New York
40 Foley Square, Room 2201
New York, NY 10007

Re: *Hernandez v. Tamrak Management Inc.*
Docket No. 19 Civ. 6825(PAE)(KHP)

Dear Judge Engelmayer,

This firm represents Plaintiff Carlos Hernandez in the above-referenced matter. I write to request an adjournment of the default judgment hearing that is currently scheduled for December 3, 2019 at 4:00 pm. Earlier today, Dov Rakower, the Chief Executive Officer for Defendant Tamrak Management, Inc. ("Tamrak"), notified me that he was in the process of retaining counsel to represent Tamrak in this matter and asked that I request an adjournment of the default judgment hearing. Because Mr. Rakower has indicated that Defendant will retain counsel that will represent Tamrak in this matter and, presumably, respond to Plaintiff's Complaint, Plaintiff does not believe that default judgment is appropriate at this time.

As a result, Plaintiff respectfully requests that the Court adjourn the default judgment hearing *sine die* to allow Defendant additional time to retain counsel and respond to Plaintiff's Complaint. However, Plaintiff respectfully requests that the Court set a deadline of January 2, 2020 for Defendant to respond to the Complaint. Plaintiff also respectfully requests that the Court schedule an initial conference in this matter (either before Your Honor or Magistrate Judge Parker) at the Court's earliest convenience. This is the first request for an adjournment of the default judgment hearing and Defendant consents to the request.

Thank you for Your Honor's attention to this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Greg N. Filosa', written over a light blue horizontal line.

Gregory N. Filosa

Hon. Roanne L. Mann
January __, 2016
Page 2

The default judgment hearing scheduled for December 3, 2019 is hereby adjourned. Judge Parker, in a separate order, will address relevant scheduling matters for this case.

SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge

December 2, 2019